1 2	Paul T. Trimmer Nevada State Bar No. 9291 Lynne K. McChrystal			
3	Nevada State Bar No. 14739  JACKSON LEWIS P.C.			
4	300 S. Fourth Street, Suite 900 Las Vegas, Nevada 89101 Tel: (702) 921-2460 Fax: (702) 921-2461 Email: paul.trimmer@jacksonlewis.com Email: lynne.mcchrystal@jacksonlewis.com			
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7	Attorneys for Defendants Unforgettable Coatings, Inc.;			
8	Unforgettable Coatings of Idaho LLC			
9	UNITED STATES DISTRICT COURT			
10	DISTRICT OF NEVADA			
11	JOSE ISMAEL ZUNIGA, on behalf of himself and all others similarly situated,	Case No.: 2:21-cv-01221-JCM-VCF		
12 13	Plaintiff,	STIPULATION TO EXTEND DEADLINE FOR DEFENDANTS TO RESPOND TO		
	vs.	PLAINTIFF'S COMPLAINT		
<ul><li>14</li><li>15</li></ul>	UNFORGETTABLE COATINGS INC,; UNFORGETTABLE COATINGS OF IDAHO			
16	LLC; DOES 1 through 50; inclusive.			
17	Defendants.			
18	IT IS HEREBY STIPULATED by and between Plaintiff Jose Ismael Zuniga, ("Plaintiff")			
19	through his counsel, Gabroy Law Offices, and Defendants, Unforgettable Coatings, Inc. an			
20	Unforgettable Coatings of Idaho, LLC, ("Defendants"), by and through their counsel, Jackso			
21	Lewis P.C., that Defendants shall have an extension up to and including July 16, 2021, in which			
22	to file their respective responses to Plaintiff's Complaint. This Stipulation is submitted and base			
23	upon the following:			
24	1. Plaintiff filed his Complaint on May 25, 2021 in the Eighth Judicial District Cou			
25	of Clark County, Nevada, Case No. A-21-835257-C. The Summons and Complaint were serve			
26	on or about June 8, 2021.			

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June 29, 2021.

Defendants' filed their Petition for Removal of Civil Action from State Court on

1	3. Defendants' Answer is currently due July 6, 2021.			
2	4. This is the first request for an extension of time for Defendants to file a response to			
3	Plaintiff's Complaint.			
4	5. This request is made in good faith and not for the purpose of delay.			
5	6. Nothing in this Stipulation, nor the fact of entering to the same, shall be construed			
6	as waiving any claim and/or defense held by any party.			
7	Dated this 7th day of July, 2021.			
8	GABROY L	AW OFFICES	JACKSON LEWIS P.C.	
9			//I	
10		broy, State Bar No. 8805	Paul T. Trimmer, State Bar No. 9291	
11	Dominique I	er, State Bar No. 14240 Bosa-Edwards, State Bar No. 15705	Lynne K. McChrystal, State Bar No. 14739 300 S. Fourth Street, Suite 900	
12	170 S. Green Henderson, N	n Valley Pkwy., Suite 280 NV 89012	Las Vegas, Nevada 89101	
13	Attorneys for	r Plaintiff	Attorneys for Defendants	
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15	IT IS SO ORDERED.  U.S. Magistrate Judge 7-7-2021 Dated:			
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